## **EXHIBIT B**

## Case 1:07-cv-00039-SM Document 262-3 Filed 11/18/11 Page 2 of 3

Kangos, Douglas / Depo 10/18/2011 7:45:00 AM

UNITED STATES DISTRICT COURT 1 2 DISTRICT OF NEW HAMPSHIRE 3 UNITED STATES SECURITIES AND 4 5 EXCHANGE COMMISSION, Plaintiffs, 6 vs 7 ERIC JAEGER, JERRY A. SHANAHAN, Defendants. 9 10 11 DEPOSITION OF DOUGLAS J. KANGOS, taken on behalf of the Plaintiff, 12 pursuant to the applicable provisions of the 13 Massachusetts Rules of Civil Procedure, before 14 15 Tara L. Wosny, Notary Public and Certified 16 Shorthand reporter within and for the 17 Commonwealth of Massachusetts, at the offices of Wilmer, Cutler, Pickering, Hale & Dorr, 60 State 18 19 Street, Boston, Massachusetts, on Tuesday, October 18, 2011 commencing at 2:45 p.m. 20 21 22 23 24 25

Page 1

## Case 1:07-cv-00039-SM Document 262-3 Filed 11/18/11 Page 3 of 3

## Kangos, Douglas / Depo 10/18/2011 7:45:00 AM

6

- 1 the testimony of this action, exhibits from the
- 2 depositions taken in this case, publicly
- 3 available information and in your own
- 4 experience.
- 5 So I want to sort of walk through that
- 6 and first of all ask, have you spoken to any
- 7 witnesses from Cabletron Enterasys or Aprisma?
- 8 A. No
- 9 Q. Did you speak to Mr. Jaeger?
- 10 A. No.
- 11 Q. How many depositions did you read?
- 12 A. I'd have to say at least two.
- 13 Q. Did you read Mr. Hofra's deposition?
- 14 A. No
- 15 Q. Did you read Mr. Jaeger's deposition?
- 16 A. Yes.
- 17 Q. In full?
- 18 A. I read a lot.
- 19 Q. And you read Mr. Henning's deposition, correct?
- 20 A. Yes
- 21 Q. Any other depositions?
- 22 A. I read excerpts from depositions, I'm sure, but
- 23 not in their entirety.
- Q. Did the excerpts come from our response to
- 25 discovery or were they independent of that?

Page 6